



United States Department of the Interior

BUREAU OF RECLAMATION
Mid-Pacific Regional Office
2800 Cottage Way
Sacramento, California 95825-1898

IN REPLY
REFER TO:

MP-150
ENV-2.00

FEB 21 2003

Ms. Delores Brown
Chief, Mitigation and Restoration Branch
Department of Water Resources
3251 S Street
Sacramento, CA 95816

Subject: Response to Notice of Preparation (NOP) for an Environmental Impact Report (EIR) for the Monterey Amendment

Dear Ms. Brown:

We have reviewed the subject NOP and provide comments below. At this time we are only generally aware of the provisions of the Amendment, therefore, our comments are general in nature. Once a draft EIR is circulated we may provide more substantive and detailed comments.

Reclamation's concerns relate to the issue of how the Amendment and other provisions may affect the Central Valley Project (CVP) and State Water Project (SWP) responsibilities and accomplishments under the Coordinated Operations Agreement (COA). Rather than revising the COA, DWR and Reclamation have continued to implement the COA by extending its original terms to cover all the many changes in standards and other regulatory requirements that have occurred since 1986 when COA was signed. Since that time, we have seen a buildup in SWP water demands and the advent of water marketing as a major part of California water resource management. Water allocation procedures, re-allocation of water supplies, and water management enhancement strategies may affect the SWP, and thus the CVP. The current operation of the Kern Water Bank and the addition and current operation of MWD's eastside storage reservoir are two prominent influences on SWP operations that were facilitated by the Monterey Agreement. Neither of these facilities were considered in the development of the COA. Reclamation also continues to be concerned about current and future CVP access to SWP Delta pumping capacity. It seems likely that implementation of the Monterey Amendment has influenced that, as well.

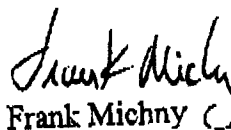
It may be that the actions the SWP takes in "Monterey Plus" are entirely consistent with the COA. However, the issues raised with respect to the sufficiency of the current COA in addressing Reclamation's interests, in addition to the potential changes in SWP operations, may require an evaluation of the existing COA terms.

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In essence we are requesting that the EIR examine in detail how the proposed action would affect CVP access to SWP Delta export capacity both from a historical and future condition perspective. In addition, should the proposed action affect CVP use of SWP Delta export capacity, the EIR should address the environmental and socio-economic effects of those changes.

We look forward to reviewing your Draft EIR when available and request that we be included on any mailing lists for that document. Please contact me if you have any questions relative to this matter at 916-978-50

Sincerely,



Frank Michny
Regional Environmental Officer